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**APPENDIX F**  
**EXAMPLE TITLE V PERMIT PLACEHOLDER LANGUAGE**  
**FOR THE**  
**PAPER AND OTHER WEB COATING MACT STANDARD**  
**40 CFR Part 63, Subpart JJJJ**

## DRAFT

### Comments and Assumptions:

1. This example Title V permit placeholder is based on the paper and other web coating (POWC) MACT standard proposed on September 13, 2000, at 40 CFR, part 63, subpart JJJJ. The example may need revisions to address any changes made in the rule when it is finalized.
2. The example language addresses an existing facility that will be subject to the POWC MACT standard for existing sources. The user should adjust these conditions as necessary for a new or reconstructed POWC facility (emission limits and time line).
3. In this example, the facility will not apply for the alternatives allowed under the MACT General Provisions, such as a compliance extension, alternative monitoring, etc. Such alternatives may require additional permit terms and submittals.
4. A “placeholder” is necessary when there is a gap between when a new MACT standard must be incorporated into a facility’s Title V permit (typically within 18 months after promulgation) and when the facility has decided on its compliance approach and associated compliance details (typically nearer to the compliance date, which is 3 years after promulgation for existing sources under subpart JJJJ). In this situation, a two-step process is used. First, a placeholder is used to incorporate the general requirements of the MACT standard into the Title V permit within 18 months after promulgation. Second, the Title V permit is revised when the compliance details have been established.

The process required for the second-step permit revision depends on how much detail the facility is able to provide during the first step, when the MACT standard is initially incorporated into the Title V permit. In fact, if the facility provides all the necessary permit information during the initial incorporation, a subsequent permit revision is not needed.

If a Title V permit revision is needed, it may require either a minor permit modification (MPM) or a significant permit modification (SPM), depending on how much detail the facility is able to provide during the initial incorporation and on the requirements of your Title V program. In general, where a case-by-case determination must be made or you must exercise significant judgment in your review, an SPM is warranted. In some cases, the facility may be able to avoid the need for an SPM later by providing the framework of its plans for compliance and monitoring at the time that the placeholder is incorporated into the permit, leaving only relatively minor details to be added during the later permit revision.

For example, a facility may decide to comply with the standard by using a capture system and control device. Under the standard, the facility may wait until it is time to comply with the standard before proposing a monitoring approach for the capture system. If the facility chooses to wait until this time to

## DRAFT

provide information on its monitoring approach, the associated second- step permit revision will require an SPM. If, in contrast, the facility has decided early on to use a capture system and can include the outlines of its monitoring approach in its placeholder, an MPM may be sufficient for the second-step permit revision to flesh out the details in the permit at the time that the facility must comply with the standard.

5. This example placeholder language incorporates the POWC MACT standard and attaches it to the POWC affected source, but assumes that the facility is not ready to select its compliance approach (e.g., control equipment or compliant coatings) and specify all the necessary compliance details at the time that the permit is opened to incorporate this placeholder (the first step in the two-step process discussed above). Thus, the placeholder includes the general requirements of the rule and retains all the compliance demonstration options of the standard, without specifying any compliance details.

Subsequently, the facility must settle on its compliance approach and other compliance details, which it must implement in time to demonstrate compliance for the month that includes the compliance date. At this time, the facility must revise its Title V permit to replace the general language of the placeholder conditions with the specifics of its selected compliance approach (the second step of the two-step process). As discussed in Section 5.2 and Appendix E, the facility may preserve the flexibility to switch among multiple compliance options through the *compliance options matrix* approach.

Because this example placeholder is general in nature and provides none of the compliance details, we have assumed that an SPM will be required for the second-step Title V permit revision. The application deadline for this permit revision depends on when the facility submits the Notification of Compliance Status required under the POWC MACT standard, as follows:

(a) If the Notification of Compliance Status is postmarked on or after the date on which the facility must begin to comply, the facility must submit the SPM application at the same time as the Notification of Compliance Status.

(b) If the Notification of Compliance Status is postmarked before the date on which the facility must begin to comply, the facility must submit the SPM on or before that date.

6. Some existing facilities may add air pollution control equipment to meet the POWC MACT standard. To change operating conditions at the facility to add such equipment and perform the necessary performance testing, facilities may need first to obtain construction permits under applicable air programs (primarily minor new source review programs). Any minor new source review permit conditions that result from the addition and operation of the air pollution control equipment should be included in the second-step Title V permit revision discussed above, unless you require an earlier Title V permit revision.

## DRAFT

7. The facility may elect to comply with the MACT standard early. However, the MACT standard will not apply prior to the month that includes the compliance date specified in the standard.

Placeholder language for the Paper and Other Web Coating MACT Standard:

### PAPER AND OTHER WEB COATING MACT STANDARD

*The facility owner or operator shall comply with 40 CFR part 63, subpart JJJJ and the provisions of subpart A as provided in Table 1 to subpart JJJJ (hereinafter “POWC MACT standard”). The requirements appear below in Conditions 1 through 4. Condition 1 identifies the emissions unit subject to the POWC MACT standard, Condition 2 presents the emission standards that apply, Condition 3 summarizes the other substantive requirements that apply, and Condition 4 presents the time line and procedural requirements related to implementing the POWC MACT standard.*

#### Condition 1. Emissions Unit Subject to the POWC MACT Standard

*Insert a specific description of the emissions unit, which is the “affected source” defined by subpart JJJJ. The description must clearly identify the equipment that is subject to the standard so there will be no doubt for an inspector or the public.*

*Example language:* The emissions unit consists of web coating lines designated by the facility as CL1, CL2, CL3, CL4, and CL5 in Building A of the facility. Collectively, these web coating lines comprise the affected source that is subject to the POWC MACT standard [as defined at 40 CFR 63.3300(a)]. The web coating lines that make up the affected source are defined as any number of work stations, of which one or more applies a layer of coating material along the length of a continuous web substrate, and any associated drying equipment between an unwind or feed station and a rewind or cutting station [per 40 CFR 63.3310(a)]. This emissions unit qualifies as an existing web coating affected source for purposes of the POWC MACT standard.

*Note: You are free to designate each coating line as a separate emissions unit (for example, if they are subject to another applicable requirement on an individual basis). However, you should designate the affected source as the collection of the lines, as defined in the POWC MACT standard.*

#### Condition 2. Emission Standards

For the emissions unit identified in Condition 1, *the facility owner or operator shall achieve compliance with the emission standards for existing web coating lines in 40 CFR 63.3320 for each and every month beginning no later than [insert the calendar month that includes the compliance date for existing affected sources, when known]. Specifically, the facility owner or operator must limit*

## **DRAFT**

organic HAP emissions for each month to at least one of the following levels:

- a) No more than 5 percent of the organic HAP applied at the affected source for the month; or
- b) No more than 4 percent of the mass of coating materials applied at the affected source for the month; or
- c) No more than 20 percent of the mass of solids applied at the affected source for the month.

*Note: The language in this condition and throughout this placeholder assumes that the facility owner or operator has not elected to specify some other, non-calendar-month period as the compliance “month,” as allowed under the definition of “month” in 63.3310(a).*

### **Condition 3. Other Substantive Requirements of the POWC MACT Standard**

#### **a) Compliance Procedures**

*The facility owner or operator shall demonstrate compliance with the POWC MACT standard for each and every month, beginning with [insert the calendar month that includes the compliance date for existing affected sources, when known], using the procedures of 40 CFR 63.3370 as follows:*

- (i) Use the procedures of 40 CFR 63.3370(b) when demonstrating compliance on the basis of as-purchased compliant coatings.
- (ii) Use the procedures of 40 CFR 63.3370(c) when demonstrating compliance on the basis of as-applied compliant coatings.
- (iii) Use the procedures of 40 CFR 63.3370(d) when demonstrating compliance on the basis of the calculated monthly allowable mass of HAP without add-on control.
- (iv) Use the procedures of 40 CFR 63.3370(e) when demonstrating compliance on the basis of capture and control to reduce organic HAP emissions to no more than 5 percent of the organic HAP applied at the affected source.
- (v) Use the procedures of 40 CFR 63.3370(f) when demonstrating compliance on the basis of capture and control to reduce organic HAP emissions to no more than 20 percent of the mass of solids applied at the affected source.

## DRAFT

(vi) Use the procedures of 40 CFR 63.3370(g) when demonstrating compliance on the basis of capture and control to reduce organic HAP emissions to no more than 4 percent of the mass of coating materials applied at the affected source.

(vii) Use the procedures of 40 CFR 63.3370(h) when demonstrating compliance on the basis of capture and control to reduce organic HAP emissions to no more than the calculated monthly allowable mass of HAP.

### **b) Testing**

*The facility owner or operator* shall conduct performance tests as required by 40 CFR 63.3360, as follows:

- (i) For organic HAP content, use the procedures of 40 CFR 63.3360(c).
- (ii) For volatile organic and solids content, use the procedures of 40 CFR 63.3360(d).
- (iii) For oxidizer destruction efficiency, use the procedures of 40 CFR 63.3360(e).
- (iv) For capture efficiency, use the procedures of 40 CFR 63.3360(f).

### **c) Monitoring**

*The facility owner or operator* shall conduct monitoring as follows:

(i) *The facility owner or operator* shall prepare a monitoring plan that addresses all the applicable monitoring systems listed below and submit the plan to *you* for approval. To be approved, the monitoring plan must provide sufficient detail to satisfy *you* that the measurements and data gathered for each month will be adequate to accurately and conclusively determine *the facility's* compliance status for the month. *The facility owner or operator* shall conduct monitoring according to the procedures in the approved plan. The monitoring plan shall identify, as applicable:

- (A) The indicator(s) of performance - i.e., the parameter, such as temperature, that will be monitored;
- (B) The measurement technique(s) - including detector type, location, and installation specifications; inspection procedures; and quality assurance and control measures;
- (C) The monitoring frequency;
- (D) The averaging time;
- (E) The definition of out-of-control periods; and
- (F) The method(s) used to determine emissions during out-of-control or missing data

## DRAFT

periods.

- (ii) For web coating lines that include intermittently-controlled work stations, *the facility owner or operator* must conduct monitoring as required by 40 CFR 63.3350(c).
- (iii) For web coating lines controlled with a solvent recovery device and demonstrating compliance based on the use of a continuous emission monitoring system (CEMS), *the facility owner or operator* must conduct monitoring as required by 40 CFR 63.3350(d)(1).
- (iv) For web coating lines controlled with a solvent recovery device and demonstrating compliance based on a liquid-liquid material balance, *the facility owner or operator* must conduct monitoring as required by 40 CFR 63.3350(d)(2).
- (v) For web coating lines controlled with an oxidizer, *the facility owner or operator* must conduct monitoring as required by 40 CFR 63.3350(e).
- (vi) For web coating lines complying through the use of a capture system and control device, *the facility owner or operator* must meet the monitoring requirements of 40 CFR 63.3350(f) for the capture system.
- (vii) For web coating lines whose compliance methods involve measuring the amount of coating material [as defined at 40 CFR 63.3310(a)] applied on the web coating lines, *the facility owner or operator* must monitor coating material usage with sufficient accuracy for a clear determination of monthly compliance status.

### **d) Notifications and Reports**

*The facility owner or operator* shall meet all applicable notification and reporting requirements specified in 40 CFR 63.3400 and 40 CFR part 63, subpart A, as follows:

- (i) Initial notification as required by 40 CFR 63.3400(b) and 63.9(b).
- (ii) Semi-annual compliance reports as required by 40 CFR 63.3400(c).
- (iii) Notification of performance tests as required by 40 CFR 63.3400(d) and 63.9(e).
- (iv) Notification of compliance status as required by 40 CFR 63.3400(e) and 63.9(h).
- (v) Notification of continuous monitoring system (CMS) performance evaluation as required by 40 CFR 63.9(g)(1).

## DRAFT

(vi) Notification that the criterion necessary to continue use of an alternative to relative accuracy [as provided by 40 CFR 63.8(f)(6)] has been exceeded, as required by 40 CFR 63.9(g)(3).

(vii) Notification of a change in information already provided as required by 40 CFR 63.9(j).

(viii) Performance test reports as required by 40 CFR 63.3400(f) and 63.10(d)(2).

(ix) Start-up, shutdown, and malfunction reports as required by 40 CFR 63.3400(g) and 63.10(d)(5).

(x) Reports of CMS performance evaluations as required by 40 CFR 63.10(e)(2)(i).

### **e) Recordkeeping**

*The facility owner or operator shall meet all applicable recordkeeping requirements as specified in 40 CFR 63.3410 and 40 CFR part 63, subpart A, as listed below. The facility owner or operator shall maintain these records in accordance with the requirements of 40 CFR 63.10(b)(1).*

(i) Records specified in 40 CFR 63.3410(a)(1) and 63.10(b)(2).

(ii) Records for sources operating CMS specified in 40 CFR 63.3410(a)(2) and 63.10(c).

(iii) Records of all liquid-liquid material balances performed for the POWC MACT standard as required by 40 CFR 63.3410(b).

### **Condition 4. Time Line and Procedural Requirements of the POWC MACT Standard**

This condition sets out the requirements and time line for the POWC MACT standard related to implementation and the initial compliance demonstration, including the Title V operating permit requirements. All aspects of the implementation time line are included here for completeness and clarity, although there may be some overlap with the requirements in other conditions.

#### **a) Initial Notification**

The facility owner or operator shall submit an initial notification in accordance with 40 CFR 63.3400(b) and 63.9(b) no later than *[insert date 1 year prior to the compliance date for existing sources, when known]*.

*Note that the proposed rule specifically allows a Title V permit application to be used*



## DRAFT

*in lieu of a separate notification. Thus, the process of incorporating this placeholder into the Title V permit will fulfill this requirement.*

### **b) Performance Test and CMS Performance Evaluation**

If required to conduct a performance test and/or CMS performance evaluation, *the facility owner or operator* shall complete these activities not later than *[insert the compliance date for existing affected sources, when known]*, meeting all applicable requirements of 40 CFR 63.3360, 63.7, and 63.8(e). *The facility owner or operator* shall also meet the following two requirements related to the performance test and/or CMS performance evaluation:

(i) *The facility owner or operator* shall submit the notification of performance test and/or notification of CMS performance evaluation not less than 60 days prior to commencing the test and/or performance evaluation. *The facility owner or operator* shall submit a site-specific test plan and/or site-specific CMS performance evaluation plan with the notification(s).

(ii) *The facility owner or operator* shall submit the results of the performance test and/or CMS performance evaluation as part of the notification of compliance status (see Condition 4d below).

### **c) Compliance Date**

*The facility owner or operator* shall comply with the applicable emission standards for existing web coating lines in 40 CFR 63.3320 by *[insert compliance date for existing affected sources, when known]*; that is, *the facility owner or operator* shall achieve and demonstrate compliance with the emission standards for each and every month beginning no later than *[insert the calendar month that includes the compliance date for existing affected sources, when known]*. Accordingly, *the facility owner or operator* must comply with the applicable operating parameter limits and related monitoring, recordkeeping, and reporting requirements by *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]*. To assure compliance, *the facility owner or operator* shall operate as indicated below:

(i) If required to compile an on-site record of its compliance approach pursuant to Condition 4(d), *the facility owner or operator* shall operate consistent with this record from *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]* until the postmark date of the application for a significant permit modification submitted pursuant to Condition 4(f).

(ii) From the postmark date of the application for a significant permit modification submitted pursuant to Condition 4(f) until the modified permit is issued, *the facility owner or operator* shall operate consistent with the application for a significant permit modification. (*The facility owner or*

## DRAFT

*operator* need not begin operating consistent with the application before *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]* if the application is postmarked prior to that date.)

(iii) After the modified permit is issued, *the facility owner or operator* shall operate consistent with the modified permit.

### **d) On-Site Record of Compliance Approach**

If *the facility owner or operator* has not submitted the application for a significant permit modification [see Condition 4(f) below] on or before *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]*, then by that date *the facility owner or operator* shall compile a complete on-site record of its operation and compliance approach, which will guide *the facility's* activities and assure compliance with the POWC MACT standard [see Condition 4(c)(i) above]. The application for a significant permit modification will be considered to have been submitted on the date that it is postmarked.

The on-site record must describe operations at the facility, including all relevant information on the affected source, control strategies, control devices, compliance demonstration option(s) to be used, and the monitoring plan. The only such information that need not be included is information that will be obtained directly from performance tests reports and/or CMS performance evaluation reports that will be completed after *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]*, such as the numerical values of capture and control device operating parameters that assure compliance. Where the performance test reports have not yet been completed, *the facility owner or operator* shall include numerical values for relevant capture and control device operating parameters that *he or she* believes, based on good air pollution control practice, will assure compliance. When the performance test reports are completed, *the facility owner or operator* shall insert the operating parameter limits determined through testing into the on-site record.

*The facility owner or operator* shall make the on-site record available to *you* for inspection upon request. *The facility owner or operator* shall retain a copy of the on-site record in accordance with the requirements of 40 CFR 63.10(b)(1).

### **e) Notification of Compliance Status**

*The facility owner or operator* shall submit the notification of compliance status that meets the applicable requirements of 40 CFR 63.3400(e), 63.9(h), 63.10(d)(2), and 63.10(e)(2) not later than 60 days after completing the relevant compliance demonstration activity as described below:

## DRAFT

(i) If demonstrating that the affected source emits no more than 5 percent of the organic HAP applied based on the use of an oxidizer and capture system, the relevant compliance demonstration activity is performance testing of the oxidizer and capture system.

(ii) If demonstrating compliance using any other option, the relevant compliance demonstration activity is the compliance demonstration for *[insert the calendar month that includes the compliance date for existing sources, when known]*.

### **f) Title V Permit Modification**

*The facility owner or operator* shall submit an application for a significant permit modification (SPM) to include the information in the on-site record of the compliance approach [see Condition 4(d) above] (if it must be developed) and the notification of compliance status [see Condition 4(e) above]. The SPM application must be consistent with *[insert a citation of the portion of your Title V rule approved by us pursuant to 40 CFR 70.5]*, including information sufficient for you to incorporate into the facility's Title V permit the applicable requirements of the POWC MACT standard, a description of the affected source and activities subject the standard, and a description of how the facility will meet the requirements of the standard. The SPM application must be associated with the notification of compliance status according to one of the following two conditions:

(i) If the notification of compliance status is postmarked on or after *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]*, the *facility owner or operator* shall submit the SPM application at the same time as the notification of compliance status.

(ii) If the notification of compliance status is postmarked before *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]*, the *facility owner or operator* shall submit the SPM application on or before *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]*.

*Note: This condition has been drafted assuming that an SPM will be necessary to revise the Title V permit. In some situation, an MPM may be sufficient. See introductory notes 4 and 5 for more information.*

### **g) Semi-Annual Compliance Reports**

*The facility owner or operator* shall submit semi-annual compliance reports that meet the applicable requirements of 40 CFR 63.3400(c) according to Conditions 4(g)(i) and (ii) below, unless rescheduled according to Condition 4(g)(iii).

## DRAFT

(i) Initial report.

(A) *Reporting period.* The reporting period for the initial compliance report extends from *[insert the first day of the calendar month that includes the compliance date for existing affected sources, when known]* to June 30 or December 31, whichever comes first.

(B) *Due date.* If the initial reporting period ends on June 30, *the facility owner or operator* shall submit the initial compliance report by the following July 31. If the initial reporting period ends on December 31, *the facility owner or operator* shall submit the initial compliance report by the following January 31.

(ii) Subsequent reports.

(A) *Reporting period.* The reporting period for each subsequent compliance report covers the calendar half from January 1 through June 30 or from July 1 through December 31.

(B) *Due date.* If the reporting period ends on June 30, *the facility owner or operator* shall submit the compliance report by the following July 31. If the reporting period ends on December 31, *the facility owner or operator* shall submit the compliance report by the following January 31.

(iii) Exceptions. *The facility owner or operator* may reschedule reporting periods and compliance report due dates according to the provisions on 40 CFR 63.3400(c)(1)(v); 63.9(i); or 63.10(a)(5), (6), or (7). In addition, *the facility owner or operator* may “streamline” the semi-annual compliance reports with other required reports according to the guidance of White Paper Number 2 (EPA, 1996).

### **h) Certifications**

In accordance with the requirements of *[insert a citation of the portion of your Title V rule approved by us pursuant to 40 CFR 70.5(d)]*, which requires all submissions to *you* to be certified by the responsible official as to truth, accuracy, and completeness, the responsible official for *the facility owner or operator*, as designated for Title V purposes, shall certify all notifications, applications, and reports required by the conditions or this permit. In addition, the responsible official for *the facility owner or operator*, as designated for Title V purposes, shall certify the on-site record of the compliance approach [see Condition 4(d)] (if it must be developed).